

Guy Ruttenberg, Bar No. 207937
guy@ruttenbergiplaw.com
Steve A. Papazian, Bar No. 288097
steve@ruttenbergiplaw.com
RUTTENBERG IP LAW,
A PROFESSIONAL CORPORATION
1801 Century Park East, Suite 1920
Los Angeles, CA 90067
Telephone: (310) 627-2270
Facsimile: (310) 627-2260

Attorneys for Plaintiff Cadence Design Systems, Inc.

(Counsel for Defendants listed on following page)

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

CADENCE DESIGN SYSTEMS, INC., *a*
Delaware Corporation,

Plaintiff,

vs.

SYNTRONIC AB, *a Publikt Aktiebolag,*
SYNTRONIC RESEARCH AND
DEVELOPMENT USA INC., *a California*
Corporation, SYNTRONIC (BEIJING)
TECHNOLOGY R&D CENTER CO., LTD.,
a Chinese Corporation,

Defendants.

Case No. 3:21-cv-03610-SI (JCS)

**NOTICE OF SETTLEMENT AND JOINT
REQUEST TO STAY ALL CURRENT
AND PENDING DEADLINES BY THIRTY
(30) DAYS**

District Judge: Hon. Susan Illston

Edward P. Sangster, SBN: 121041
edward.sangster@klgates.com
Jason N. Haycock, SBN: 278983
jason.haycock@klgates.com
K&L GATES LLP
Four Embarcadero Center, Suite 1200
San Francisco, CA 94111
Telephone: +1 415 882 8200
Facsimile: +1 415 882 8220

Jeffrey C. Johnson
jeff.johnson@klgates.com
K&L GATES LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Telephone: + 1 206 623 7580
Facsimile: + 1 206 623 7022

Attorneys for Defendants Syntronic AB and Syntronic Research and Development USA Inc.

Chao “Wendy” Wang, Bar No. 289325
WWang@perkinscoie.com
PERKINS COIE LLP
3150 Porter Drive
Palo Alto, California 94304-1212
Telephone: +1.650.838.4300
Facsimile: +1.650.838.4350

Matthew C. Bernstein, Bar No. 199240
MBernstein@perkinscoie.com
Miguel J. Bombach, Bar No. 274287
MBombach@perkinscoie.com
Abigail A. Gardner, Bar No. 334598
AGardner@perkinscoie.com
PERKINS COIE LLP
11452 El Camino Real, Ste 300
San Diego, California 92130-2080
Telephone: +1.858.720.5700
Facsimile: +1.858.720.5799

Attorneys for Defendant Syntronic (Beijing) Technology R&D Center Co., LTD.

Plaintiff Cadence Design Systems, Inc. (“Cadence”), along with Defendants Syntronic AB, Syntronic Research and Development USA Inc. (“Syntronic USA”), Syntronic (Beijing) Technology R&D Center Co. Ltd. (“Syntronic Beijing”) (collectively “Defendants,” and together with Cadence, the “Parties”) hereby notify the Court that they have reached a binding settlement agreement and stipulate as follows:

WHEREAS, the Parties have reached agreement on terms to settle the entirety of the case;

WHEREAS, on October 13, 2022, the Parties entered a binding term sheet;

WHEREAS, as part of and to effectuate the terms of their settlement agreement, the Parties seek to stay for thirty (30) days all current and pending deadlines; and

WHEREAS the Parties expect to file a joint stipulation of dismissal without prejudice within the next 30 days.

THEREFORE, it is hereby agreed and stipulated by and among the Parties, with the Court’s consent, as follows:

1. The matter shall be stayed as to all current and pending deadlines for thirty (30) days, to November 14, 2022.¹
2. The status conference scheduled for October 14, 2022, shall be continued to November 18, 2022, with the expectation that it will vacated by the filing of a stipulation for dismissal.

IT IS SO STIPULATED AND REQUESTED.

DATED: October 13, 2022

By: /s/ Guy Ruttenberg

Guy Ruttenberg
guy@ruttenbergiplaw.com
Steve Papazian
steve@ruttenbergiplaw.com
RUTTENBERG IP LAW, A PROFESSIONAL
CORPORATION
1801 Century Park East, Suite 1920
Los Angeles, CA 90067
Telephone: (310) 627-2270

¹ Thirty days from October 13, 2022, is November 12, 2022, a Saturday, and the next business day is November 14, 2022.

Facsimile: (310) 627-2260
Attorneys for Plaintiff

DATED: October 13, 2022

By: /s/ Jason N. Haycock

Edward P. Sangster
edward.sangster@klgates.com
Jason N. Haycock,
jason.haycock@klgates.com
K&L Gates LLP
Four Embarcadero Center, Suite 1200
San Francisco, CA 94111
Telephone: +1 415 882 8200
Facsimile: +1 415 882 8220

Jeffrey C. Johnson
jeff.johnson@klgates.com
K&L Gates LLP
925 Fourth Avenue, Suite 2900
Seattle, WA 98104
Telephone: + 1 206 623 7580
Facsimile: + 1 206 623 7022

*Attorneys for Defendants Syntronic AB and Syntronic
Research and Development USA Inc.*

DATED: October 13, 2022

By: /s/ Chao "Wendy" Wang

Chao "Wendy" Wang
WWang@perkinscoie.com
Perkins Coie LLP
3150 Porter Drive
Palo Alto, CA 94304
Telephone: 650-838-4315
Facsimile: 650-838-4350

Matthew C. Bernstein
MBerstein@perkinscoie.com
Miguel J. Bombach
MBombach@perkinscoie.com
Perkins Coie LLP
11452 El Camino Real, Suite 300
San Diego, CA 92130-2080
Telephone: 858-720-5700

*Attorneys for Defendant Syntronic (Beijing)
Technology R&D Center Co., LTD.*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Judge Susan Illston
United States District Judge